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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
MICHAEL KEITH RUBINO,  
  
Defendant.

CASE NO. 2:25-CR-00124-TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: July 31, 2025  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

Plaintiff United States of America (the “government”), by and through its counsel of record, and  
defendant Michael Keith Rubino, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on July 31, 2025.
2. By this stipulation, the defendant now moves to continue the status conference until August 21, 2025, at 9:30 a.m., and to exclude time between July 31, 2025, and August 21, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case consists of over 300 pages of documents and records, including multiple hours of video and audio recordings as well as forensic extractions of various cellular devices. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying.

b) Counsel for the defendant desires additional time to review the current charges, conduct investigation and research related to the charges, review and copy produced discovery, discuss potential resolutions with his client, and otherwise prepare for trial.

c) Counsel for the defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of July 31, 2025, to August 21, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at the defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 24, 2025

KIMBERLY A. SANCHEZ  
Acting United States Attorney


/s/ SAM STEFANKI  
SAM STEFANKI  
Assistant United States Attorney

Dated: July 24, 2025

/s/ DOUGLAS BEEVERS  
DOUGLAS BEEVERS  
Counsel for Defendant  
MICHAEL KEITH RUBINO

**ORDER**

IT IS SO FOUND AND ORDERED this 25<sup>th</sup> day of July, 2025.



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Troy L. Nunley  
Chief United States District Judge